

## Effects of GHS Implementation on Pesticide Safety Education and Regulation in the States

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## American Association of Pesticide Safety Educators

- Represents a National Network
- Pesticide Safety Educators/Trainers
- Competency and Enforcement Personnel
- Primary Stakeholders

## Positive Impact of GHS

- Adopting all GHS physical hazard classes and corresponding label elements, including pictograms and signal words, will provide the user or handler with substantially more information about pesticide products than they currently have.

## Positive Impacts of GHS

- The decision to maintain precautionary statements including; first aid, storage and disposal statements, further enhances the ability of the user to protect themselves and the environment.

## Positive Impact of GHS

- Requiring telephone numbers as part of supplier identifier information on labels will enhance the users ability to obtain further information in case of emergencies, for clarifying directions and addressing unforeseen situations.

## The Regulated Community

- The regulated community consists not only of industry but those who sell, handle or apply pesticides such as:

-Retailers	-Dealers
-Applicators	-Consultants
-Worker Protection Standard trainers and handlers	

## Impacts to State Education and Regulatory Programs

- Every pesticide user and handler will need to understand the new labels....
- Therefore, all applicators must be re-trained and re-tested to determine competency and comply with existing laws and regulations.

## Impacts to State Regulatory Programs

- Many state regulations are tied to specific signal words. State regulations will need to be changed to reflect GHS changes.

EX: School IPM programs which allow use of Caution only labeled products.

## Impacts to State Regulatory Programs

- All state certification exams will need to be revised.
- Standards for certification are not consistent across states, thus limiting the sharing of exams.
- Categories of applicators are not standard among states.

## Impacts to Extension Education Programs

- All Training materials will require changes to reflect GHS.
- This includes manuals, videos, websites, fact sheets, slide presentations, etc.
- Re-training trainers will have to be conducted.
- Standards for certification are not consistent across states, thus limiting the sharing of training materials.

## Cost/Benefit Analysis?

- There clearly is a benefit to adopting GHS.
- It will take time and personnel to make the necessary changes to regulations and educational materials.
- It will take more time to implement these changes.
- It can't be done without additional funding.

## Implementation - Education Before Regulation

- If the GHS is implemented before outreach materials related to changes of signal words and new symbols and pictograms have been developed, and few or no applicator/user, dealer, retailer, training has occurred...

## Implementation - Education Before Regulation

- Then understanding of these tools cannot be expected and compliance will be predictable.

Education Must Come Before Regulation  
If Successful Implementation Is To Be  
Expected!!!

## Education

- Outreach to the dealer, user and handler communities and its associated costs must be considered as a **primary** part of the implementation of GHS for pesticides.
- Outreach is as important to successful and safe implementation as how EPA/OPP registration staff will handle approving new labels.

## Implementation

- Prior to implementation, as many questions and situations as possible, related to GHS, must be answered.
- Experience with other new regulatory programs involving pesticides, such as WPS and Endangered Species, have demonstrated that when answers are vague at implementation, confidence and credibility of trainers and regulators is lost.

## Implementation

- Early on in the implementation plan it will be necessary to get basic information into the hands of the people who sell and handle pesticide products:

-Retailers	-Master Gardeners
-Applicators	-Consultants
-Dealers	-WPS trainers/handlers

## Implementation

- The Association of American Pesticide Safety Educators (AAPSE), believes that not one new label should be allowed on the market until initial outreach efforts and support materials are in place.

## Implementation

- AAPSE strongly suggests that by the time rulemaking is complete the rudimentary outreach of a simple fact sheet that addresses the new usage of signal words, symbols, and pictograms is in place and entered into the training arena, initially as awareness.

## Implementation

- Full incorporation into training manuals, exams and the long list of other resources which are currently in place should occur during implementation.

## Implementation

- States will need to decouple existing state regulations tied to the current classification system.

## Timeline Additions and Suggestions

- Assume rulemaking in 2008:
  - Initiate development of outreach materials, most particularly a fact sheet that can be utilized in training and added to study manuals as an addendum prior to manual revisions.

## 2009

- Finalize rule.
- Finalize development of outreach materials.
- Develop outreach material appropriate to move into trade outlets i.e. attached to containers, including copies in shipping boxes.

## 2009

- Work with retailers to provide these materials to customers.
- Extension initiates work on updating training materials.
- States prepare to decouple existing state regulations tied to the current classification system

## 2010

- EPA and educators initiate formal education campaign.
- Fully include new signal words, symbols, and pictograms as formal portion of training programs for applicators, retailers, etc.
- Revision of existing pesticide safety education outreach materials continues.

## 2010

- States re-write pesticide applicator certification exams to reflect GHS changes.
- States continue decoupling regulations tied to current classification system and write new regulations.

## 2011

- States complete the process of decoupling existing state regulations.
- States begin to introduce new exams reflecting GHS label changes.
- Extension continues to train applicators and handlers about GHS changes.

## 2012

- Full implementation is achieved.
- Extension finalizes revisions of materials that were not revised in 2010 and 2011.

## 2012

- Extension continues outreach education for users and handlers of pesticides.
- State implementation of new exams takes place.

AAPSE is willing and ready to work with EPA on GHS implementation to facilitate a smooth transition to the new labeling program.

It is our primary concern that all users understand the hazards presented with the use of pesticides and have the knowledge and skills necessary to use them responsibly.